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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Pamela Brown, Individually, and as Special  
Administratrix of the Estate of James  
Brown,

Plaintiffs,

v.

United States of America,  
Defendant.

Case No. 2:20-cv-01814-GMN-DJA

**Stipulation to Extend Remaining  
Deadlines (First Request)**

Pursuant to Local Rule 26-4 and Local Rule IA 6-1, the parties respectfully move for a 60-day extension of the remaining deadlines. This is the first request for an extension of time. This stipulation is filed more than 21 days before the next pending deadline in the Discovery Plan and Scheduling Order.

**A. Discovery completed to date**

This is a complex medical malpractice wrongful death case. The parties have provided disclosures, exchanged written discovery, including numerous medical records, subpoenaed multiple third parties, have completed multiple depositions, and otherwise diligently moved forward in this matter.

**B. Remaining Discovery**

The parties anticipate several depositions of fact witnesses, as well as expert and rebuttal witnesses. The parties are still exchanging documents and additional written discovery. They will disclose expert reports and rebuttal reports. They will continue written discovery including subpoenas to third parties. They will continue to provide supplemental disclosures.

**C. Reasons for Requested Extension**

The parties have completed the depositions of several percipient witnesses, and they are collectively working to schedule depositions of several former VA employees, Dr. Ayat, Dr. Kalayeh, and Dr. Green. In early September, Plaintiff issued written discovery requests to Defendant. The parties recently reached an agreement wherein Defendant will respond to written discovery in early November and then attempt to schedule the remaining depositions in late November and December.

Given the above, the parties anticipate that the current expert deadline (November 22, 2021) does not allow sufficient time for the parties to complete the remaining depositions, obtain transcripts, and work with experts to review and incorporate the information into their respective disclosures. The parties are seeking this extension in order to allow sufficient time to complete the necessary discovery in this complex case. The parties have and will continue to cooperate in conducting discovery and are seeking this extension in good faith and without purpose of delay.

**D. Proposed revised discovery schedule**

	Current due date	Proposed due date
Discovery Cut-Off	January 20, 2022	March 23, 2022
Amending Pleadings	October 22, 2021	December 21, 2021
Adding Parties	October 22, 2021	December 21, 2021
Expert Disclosures	November 22, 2021	January 22, 2022

Rebuttal Expert Disclosures	December 21, 2021	February 21, 2022
Dispositive Motions	February 21, 2022	April 22, 2022
Pre-Trial Order	March 23, 2022	May 23, 2022

Respectfully submitted this 29th day of September 2021.

LAIRD LAW, PLLC

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IT IS SO ORDERED:

DANIEL J. ALBREGTS  
 UNITED STATES MAGISTRATE JUDGE

DATED: September 30, 2021